



**Rocky Flats Citizens Advisory Board
Recommendation 2004-1**

**Comments and Recommendations on Building 371/374 Closure Project Decommissioning Operations Plan
Modification 4**

Approved January 8, 2004

Letter to:

Mr. Frazer Lockhart
U.S. Dept. of Energy
Rocky Flats Field Office
10808 Hwy. 93, Unit A
Golden, CO 80403

Mr. Mark Aguilar
U.S. EPA
999 18th St. Ste. 500
Denver, CO 80202

Mr. Steve Gunderson
CDPHE
4300 Cherry Creek Dr. South
Denver, CO 80246

Dear Mr. Lockhart, Mr. Aguilar, and Mr. Gunderson:

The Rocky Flats Citizens Advisory Board appreciates the opportunity to review the "Building 371/374 Closure Project Decommissioning Operations Plan, Modification 4," dated December 12, 2003. We offer the following comments and recommendations on the document:

I. Pre-demolition. The board is concerned about using radionuclide soil action levels contained in Attachment 5 of RFCA to set levels of residual contamination, especially since most of the residual contamination will be on the surface of the walls and floors and not directly measurable as a volume of contamination. The Board is also concerned there is no plan in place to control dust or contaminant emissions. Also, we are concerned that the Site has not previously used explosives in the demolition of a building in which there will be contamination left behind.

A. We recommend that instead of using the volumetric measurements from Attachment 5 of the Rocky Flats Cleanup Agreement Radionuclide Soil Action Levels, the site use surficial or areal contaminant units of measurement, which we think is more appropriate for measuring contamination on surfaces and for setting levels of surficial contamination that are expected to remain in the building. The unit of measurement should be disintegrations per minute per 100 centimeters squared (dpm/100 cm²). The RFCA Attachment 5 was meant to measure volume of radioactivity.

B. We recommend the Site have a plan in place to control dust and airborne contamination caused by the demolition of the building or the use of explosives before proceeding with the demolition.

C. We recommend residents within a five-mile radius of the site be notified by mail that the site will use explosives in the demolition of a

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- building, and the notice will include an offer to give these residents a full explanation of the building decommissioning and demolition plan.
- D. We request the explosive demolition contractor provide evidence of previous work experience within the last five years of the contractor's use of controlled explosives in contaminated buildings.
- E. We recommend the site publish its contingency plan for detonating failure or charges that fail to explode.
- F. Because there may be contamination left on the ground around the building and the use of water sprays for dust suppression, we recommend the site have in place a corrective action plan to control runoff and remediate contaminated mud.

II. During Demolition. RFCAB is concerned with the use of explosives to demolish a Type 3 contaminated building. The Site had previously stated it would not use explosives in such a building. While we concur that the building would be difficult to tear down using conventional demolition techniques, we urge the Site to use extreme caution in using explosives. We appreciate and concur with the Site's concerns over worker health and safety. We believe it should show the same concern for residents who live downwind of the Site.

- A. We recommend the Site ensure there will be no release of airborne contamination, particularly radiological contamination, into the environment and ensure the protection of both worker health and community safety before they proceed with the use of explosives.
- B. We recommend the site not use explosives for the Building 371/374 demolition on days when the wind is blowing more than 10 miles per hour.
- C. We recommend the Site verify that any surface where explosive charges are used is free-released before charges are placed.
- D. We recommend the use of dedicated temporary, near-real time monitors during demolition with onsite laboratory support, in addition to the Radioactive Ambient Air Monitoring Program, to monitor airborne silica, nuisance dust and airborne radioactivity.

III. Post-demolition. Board Members are concerned that considerations of long-term stewardship be included in Site cleanup documents. In particular, the Board requests the site define the information and data from the Building 371/374 decommissioning and demolition that will be collected and preserved and how it will be made accessible to the public.

IV. General concerns. While we understand that the subcontractor is preparing a demolition plan for the building, which will involve dust and air quality control, we noted several deficiencies in the original DOP and the DOP Modification 4. Because of our concerns, we recommend the following be included in the Decommissioning Operations Plan Modification and further that these inclusions be made available for public comment:

- A. A groundwater model that includes projections of groundwater flow and a projected flow of any contaminant plumes in the area after demolition and environmental remediation.
- B. The demolition plan that includes radiation monitoring.
- C. A plan to control the potential emission of dust and contaminants, particularly during explosive demolition.
- D. The final land configuration of the area now housing the Building 371/374 complex.

Because of the board's concern over the use of explosives in a Type 3 contaminated building, we recommend the Site address the board's concerns before it proceeds with the demolition.

We thank the Department of Energy for the opportunity to comment on this important document. We look forward to your reply and to the continuing dialogue and partnership with the Department of Energy.

Cordially,

Victor Holm
Chair

The Rocky Flats Citizens Advisory Board is a community advisory group that reviews and provides recommendations on cleanup plans for Rocky Flats, a former nuclear weapons plant outside of Denver, Colorado.

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